

1 RENE L. VALLADARES  
2 Federal Public Defender  
3 Nevada State Bar No. 11479  
4 BRIAN PUGH  
5 Assistant Federal Public Defender  
6 411 E. Bonneville, Ste. 250  
7 Las Vegas, Nevada 89101  
(702) 388-6577/Phone  
(702) 388-6261/Fax  
Brian\_Pugh@fd.org

6 Attorney for Maria Magdalena Mendoza

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 MARIA MAGDALENA MENDOZA,

14 Defendant.

Case No. 2:20-cr-00212-RFB-BNW

**STIPULATION TO CONTINUE  
EVIDENTIARY HEARING  
(Second Request)**

16 IT IS HEREBY STIPULATED AND AGREED, by and between Jason Frierson, United  
17 States Attorney, and Eric C. Schmale, Assistant United States Attorney, counsel for the United  
18 States of America, and Rene L. Valladares, Federal Public Defender, Brian Pugh, Assistant  
19 Federal Public Defender, counsel for Maria Magdalena Mendoza, that the evidentiary hearing  
20 currently scheduled for November 30, 2022 at 9:00 a.m., be vacated and set to a date and time  
21 convenient to this Court, but no sooner than sixty (60) days.

22 The Stipulation is entered into for the following reasons:

23 1. The parties are trying to resolve the case through negotiations and are  
24 investigating factual issues relevant to the terms of the proposed plea agreement. Under the  
25 proposed plea agreement, Ms. Mendoza would waive her right to pursue any pretrial motions  
26 that have been or could be filed, including her motion to suppress.

1           2.       Counsel for the defense is on annual leave on the date of the hearing.

2           3.       The parties request additional time to complete negotiations and resolve the case  
3 by plea agreement.

4           4.       The parties agree to the continuance. The defendant is not incarcerated and does  
5 not object to the continuance.

6           This is the second stipulation to continue filed herein.

7           DATED this 16th day of November 2022.

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9           RENE L. VALLADARES  
10           Federal Public Defender

11           JASON M. FRIERSON  
12           United States Attorney

13           By /s/ Brian Pugh  
14           BRIAN PUGH  
15           Assistant Federal Public Defender

16           By /s/ Eric Schmale  
17           ERIC C. SCHMALE  
18           Assistant United States Attorney

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

MARIA MAGDALENA MENDOZA,

Defendant.

Case No. 2:20-cr-00212-RFB-BNW

## ORDER

## ORDER

IT IS THEREFORE ORDERED that the evidentiary hearing currently scheduled for November 30, 2022, at the hour of 9:00 a.m., be vacated and continued to February 1, 2023 at the hour of 9 :00 a .m.

DATED this 21st day of November, 2022.

  
RICHARD F. BOULWARE, II  
United States District Judge